

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA )  
                              )  
PLAINTIFF,                )  
                              )  
v.                         ) No. 19-cr-20685  
                              )  
CARL L. COLLINS, III     ) HON. GERSHWIN A. DRAIN  
                              )  
DEFENDANT.                )  
                              )

**SECOND NOTICE OF INTENT TO  
INTRODUCE RULE 404(b) EVIDENCE AT TRIAL**

COMES NOW the United States of America, by and through its undersigned attorneys, and hereby files its Second Notice of Intent to Introduce Rule 404(b) Evidence at Trial.

Insofar as it is not otherwise admissible, the following evidence may be admitted under Federal Rule of Evidence 404(b) to show the defendant's intent, plan, knowledge, and absence of mistake or lack of accident:

On or about March 28, 2017, the defendant filed a delinquent 2015 corporate tax return for Alpha Living, LLC. The defendant falsified this tax return by failing to report approximately \$361,467 in gross receipts by means of checks payable to Alpha Living, LLC that he caused to be deposited into his

Bank of America IOLTA account rather than into the bank account of Alpha Living, LLC.

Respectfully submitted,

Matthew J. Schneider  
United States Attorney

By: /s/ Kenneth C. Vert  
KENNETH C. VERT  
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Dated: September 9, 2020

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2020, the foregoing was filed with the CM/ECF system which will send notification of such filing to:

David M. Garvin, P.A.  
200 South Biscayne Blvd.  
Suite 3150  
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/s/ Jeffrey A. McLellan  
Jeffrey A. McLellan